

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

MDL No. 2419

Master Dkt. No. 1:13-md-2419- RWZ

This Document Relates To:
All Cases

**JOINT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT UNIFIRST CORPORATION TO RESPOND TO
PLAINTIFFS' STEERING COMMITTEE'S MOTION TO AMEND
PREVIOUSLY FILED SHORT FORM COMPLAINTS**

Defendant UniFirst Corporation (“UniFirst”) and the Plaintiffs’ Steering Committee (“PSC”) hereby jointly move for an extension of time until September 4, 2014, for UniFirst to respond to the PSC’s Motion to Amend Previously Filed Short Form Complaints (“the Motion to Amend”) (Dkt. No. 1291).

In support of this motion, UniFirst and the PSC state as follows:

1. The PSC filed its Motion to Amend on July 24, 2014, asking the Court to deem amended previously filed Short Form Complaints to add claims that were not yet ripe when plaintiffs first filed the Short Form Complaints.

2. Although the majority of claims to be added are Chapter 93A claims, the PSC may also seek leave to add other “ripened” claims referenced in, but not asserted by, a Short Form Complaint.

3. UniFirst and the PSC request this extension so that the PSC can inventory all Short Form Complaints and identify (1) the specific cases to which the amendments will apply, and (2) the nature of the additional claims to be asserted in each case.

4. UniFirst and the PSC believe that such an inventory and identification of additional potential claims will narrow or resolve UniFirst's opposition to the PSC's Motion to Amend.

WHEREFORE, UniFirst and the PSC respectfully request that the Court grant this joint motion and enter an order extending UniFirst's time to respond to the PSC's Motion to Amend to September 4, 2014.

Dated: August 7, 2014

Respectfully submitted,

DEFENDANT UNIFIRST CORPORATION

By its attorneys,

/s/ James C. Rehnquist

James C. Rehnquist (BBO #552602)
Roberto M. Braceras (BBO # 566816)
Abigail K. Hemani (BBO # 650721)
Michael K. Murray (BBO # 563804)
GOODWIN PROCTER LLP
Exchange Place
53 State Street
Boston, Massachusetts 02109-2881
Telephone: 617.570.1000
Facsimile: 617.523.1231
jrehnquist@goodwinprocter.com
rbraceras@goodwinprocter.com
ahemani@goodwinprocter.com
mmurray@goodwinprocter.com

AND

THE PLAINTIFFS' STEERING COMMITTEE

By their attorneys,

/s/ Gerard Stranch, IV

J. Gerard Stranch, IV
Benjamin A. Gastel
BRANSETTER, STRANCH & JENNINGS
PLLC
227 Second Avenue North
Nashville, TN 37201
Telephone: (615) 254-8801
Facsimile: (615) 255-5419
gerards@branstetterlaw.com
beng@branstetterlaw.com

*Plaintiffs' Steering Committee and Tennessee
State Chair*

Thomas M. Sobol
Kristen A. Johnson
HAGENS BERMAN SOBOL SHAPIRO LLP
55 Cambridge Parkway, Suite 301
Cambridge, MA 02142
Telephone: (617) 482-3700
Facsimile: (617) 482-3003
tom@hbsslaw.com
kristenj@hbsslaw.com

Plaintiffs' Lead Counsel

Elizabeth J. Cabraser
Mark P. Chalos
Annika K. Martin
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
150 Fourth Avenue North, Suite 1650
Nashville, TN 37219-2417
Telephone: 615.313.9000
Facsimile: 615.313.9965
ecabraser@lchb.com
mchalos@lchb.com

akmartin@lchb.com

Federal/State Liaison

Marc E. Lipton
LIPTON LAW
18930 W. 10 Mile Road
Southfield, MI 48075
Telephone: (248) 557-1688
Facsimile: (248) 557-6344
marc@liptonlawcenter.com

Kim Dougherty
JANET, JENNER & SUGGS, LLC
31 St. James Avenue, Suite 365
Boston, MA 02116
Telephone: (617) 933-1265
kdougherty@myadvocates.com

Patrick T. Fennell
CRANDALL & KATT
366 Elm Avenue, S.W.
Roanoke, VA 24016
Telephone: (540) 342-2000
pfennel@crandalllaw.com

Mark Zamora
ZAMORA FIRM
6 Concourse Way, 22nd Floor
Atlanta, GA 30328
Telephone: (404) 451-7781
Facsimile: (404) 506-9223
marc@markzamora.com

Plaintiffs' Steering Committee

LOCAL RULE 7.1(A)(2) CERTIFICATION
AND CERTIFICATE OF SERVICE

I, James C. Rehnquist, hereby certify that counsel for Defendant, UniFirst Corporation, conferred by e-mail with opposing counsel in an effort to resolve or narrow the issues presented in this motion prior to filing. Plaintiffs join in the relief sought herein.

I further certify that a copy of this document, filed through the CM/ECF system will be accessible to those attorneys who are registered with the Court's electronic filing system and Notice of Electronic filing (NEF) will be sent to these parties by operation of the CM/ECF system on August 7, 2014.

/s/ James C. Rehnquist